1	PAUL W. REIDL (State Bar No. 155221) Law Office of Paul W. Reidl					
2	Second Floor					
3	241 Eagle Trace Drive Half Moon Bay, CA 94019					
4	(650) 560-8530 paul@reidllaw.com					
5	Attorney for Central Garden & Pet Company					
6	UNITED STATES DISTRICT COURT					
7	NORTHERN DISTRICT OF CALIFORNIA					
8	NORTHERN DISTRICT OF CHER OR VIII					
9	CENTRAL GARDEN & PET	I				
10	COMPANY,	C N- 4-15 00	COO ICM			
11	a Delaware Corporation	Case No. 4:15-cv-00	609-J2 W			
12	Plaintiff,		MINISTRATIVE RELIEF TO			
13	v. CARLSON MORGAN, LLC,		CONFERENCE AND RELATED			
14	a California Limited Liability Company,	*	ATION OF PAUL W. REIDL IN OF [Local Rules 6-3, 7-11]			
15	Defendant.					
16						
17						
18	Pursuant to Local Rules 6-3 and 7-1	1, Plaintiff hereby mo	ves the Court to continue the Case			
19	Management Conference and the scheduled	dates indefinitely. The	Clerk has entered a default against			
20	Defendant. Plaintiff anticipates filing a motion for default judgment within the next thirty (30 days).					
21	Since Defendant has not defended the case, a Case Management Plan and Conference is unnecessary.					
22	For these reasons and as set forth in the following	owing Declaration, Pla	intiff respectfully requests that the			
	motion be granted and the deadlines be conti	otion be granted and the deadlines be continued indefinitely.				
23 24	MOTION TO CONTINUE THE INITIAL CASE MANAGEMENT CONFERENCE AND RELATED DATES	Page 1	Case No. 4:14-cv-00609-JSW			

1	Respectfully submitted,				
2	LAW OFFICE OF PAUL W. REIDL				
3	By: Baner Beidl				
4					
5	Paul W. Reidl (CA Bar No. 155221) LAW OFFICE OF PAUL W. REIDL Second Floor				
7	241 Eagle Trace Drive Half Moon Bay, CA 94019				
8	(650) 560-8530 paul@reidllaw.com				
9	DECLARATION OF PAUL W. REIDL				
10	1. I am an attorney at law duly admitted to practice before this Court. I represent the				
11	Plaintiff, Central Garden & Pet Company in this action. I have personal knowledge of the matters				
12	testified to herein.				
13	2. The Defendant is a sole proprietership in Modesto, California. Service was delayed				
14	because he was never available at his business address. Shortly after Defendant was served, its				
15	principal called the undersigned and said that he would not be defending the case because he could				
16	not afford counsel. Subsequent e-mails and telephone calls to Defendant's principal have not been				
17	returned.				
18	3. The reason for continuing the dates is that Defendant is in default and Plaintiff intends				
19	to file a motion for default judgment. Under these circumstances, there is no need to prepare and hold				
20	a hearing on a Case Management Plan.				
21					
22 23					
24	MOTION TO CONTINUE THE INITIAL CASE MANAGEMENT Page 2 Case No. 4:14-cv-00609-JSW CONFERENCE AND RELATED DATES				

DATES

4. Defendant has defaulted and has not return	ed telephone calls or e-mails. Since no one				
has appeared on Defendant's behalf, there is no counsel of	frecord from whom Defendant can obtain				
a stipulation to a continuance.					
5. The substantial harm and prejudice to going	g through the Case Management process is				
that it would be attorney and Court time spent engaging in	a process that ultimately would be moot.				
The time would be better spent preparing the default motion and related papers.					
6. There have been no previous modifications	to the schedule in the case.				
7. Ultimately, the requested time modification	will have no effect on the schedule for the				
case because the case is likely to be decided on Plaintiff's	motion for default judgment.				
I declare under penalty of perjury under the laws o	f the state of California that the foregoing				
is true and correct.					
Executed this 28th day of April 2015 in Half Moon Bay, California.					
/s/ Paul W. R	<u>eidl</u>				
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MOTION TO CONTINUE THE INITIAL CASE MANAGEMENT Page 3 CONFERENCE AND RELATED	Case No. 4:14-cv-00609-JSW				

1	[PROPOSED] ORDER				
2	Based on the foregoing memorandum supporting declaration, and good cause being shown,				
3	IT IS HEREBY ORDERED that the Initial Case Management Conference scheduled for 11:00 AM				
4	on May 8, 2015 and the other deadlines set forth in the Court's February 10, 2015 Order Setting				
5	Initial Case Management Conference and ADR Deadlines are continued indefinitely. Plaintiff shall				
6	file a motion for default judgment within thirty (30 days) of the date of this Order.				
7					
8	Dated:				
9		Jeffrey S. White United States District Co	Jeffrey S. White United States District Court Judge		
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24	MOTION TO CONTINUE THE INITIAL CASE MANAGEMENT	Page 4 Case No. 4:1-	4-cv-00609-JSW		
•	DATES				